

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

MICHAEL J DANIELS, ET AL.,

Plaintiffs,

5-19-CV-01280-RBF

VS.

AETC II PRIVATIZED HOUSING, LLC,
AETC II PROPERTY MANAGERS, LLC,
HUNT ELP, LTD,

Defendants.

DEFENDANTS' PROPOSED VOIR DIRE QUESTIONS TO PROPOSED JURORS

Defendants submit their proposed questions for the Court's voir dire examination to the prospective jurors:

A. Experience with the Legal System

- a. Anyone have any training or work experience in the legal field?
- b. Does anyone here have a lawyer in their family?
- c. Have you ever retained an attorney?
 - i. Was your experience retaining an attorney positive or negative?
- d. Has anyone ever served on a jury before?
 - i. What type of case?
 - ii. Verdict reached?
 - iii. Were you the foreperson?
 - iv. Were you satisfied with the process/experience?

B. Landlord/Tenant Relationship

- a. Some of you indicated on your questionnaires that you had experience as a landlord?
 - i. Will you tell me about that?
- b. Does anyone's primary occupation involve entering into Lease Agreements?
 - i. What is your occupation?
 - ii. Are you typically the Lessor or Landlord?
 - iii. Are the Lease Agreements negotiated?
 - iv. Are the Lease Agreements forms?
 - v. If Lease terms are on a form and are not negotiated, do you feel that the lease terms are unfair?
 - vi. Do the Lease Agreements you work with place duties on both the landlord and the tenant?
 - vii. Do you allow or require tenants to inspect the property at or before occupancy?

- viii. Do you make all repairs requested based on the inspection?
- ix. Has any tenant broken a lease? Reason?
- x. Ever have a tenant file a complaint or dispute? Reason? Was it resolved to your satisfaction?
- c. How many of you have been tenants before?
 - i. Has anyone had to break lease? Reason?
 - ii. Has anyone had repairs that the landlord didn't make?
 - iii. Has anyone felt that their landlord breached the lease?
 - 1. What was the basis for the claimed breach?
 - 2. Were you satisfied with the outcome/result?

C. Military Experiences

- a. A number of you indicated that either you or a family member were members of the military. How many of you personally served in the military?
 - i. How long? Which branch? What positions/ranks?
 - ii. Where stationed?
 - iii. Did you ever live on base housing?
 - iv. What are your feelings about base housing?
- b. Now, which of you indicated that you had family members who served in the military?
 - i. How long? Which branch? What positions/ranks?
 - ii. Where stationed?
 - iii. Did they ever live on base housing?
 - iv. Did you visit their base housing?
 - v. What are your feelings about your family members' base housing?
- c. Anyone been out to Randolph AFB?
- d. Anyone been inside the historic homes available for military members and their family?
 - i. What were your impressions.
- e. Do you have an opinion on whether the homes were in good order and repair?
- f. Do you have an opinion on whether the homes were safe, clean and habitable?

D. Mold

- a. There will be some testimony in this case about mold.
- b. Mold is everywhere, indoors and outdoors, but some people can be allergic to mold. Is anyone here allergic to mold?
- c. Has anyone experienced a health complaint related to mold?
- d. Has anyone experienced mold in your home that required professional cleaning?
- e. Has anyone had enough visible mold in their home that they were concerned?
 - i. What did you do?
 - ii. How did the situation resolve itself?
 - iii. Were you satisfied?
- f. Has anyone had a family member who experienced a health complaint related to mold?
- g. Has anyone had a family member experience mold in their home that required professional cleaning?
- h. Has anyone had a family member who had enough visible mold in their home that they were concerned?

- i. What did they do?
- ii. How did the situation resolve itself?
- iii. Were they satisfied?

E. Conclusion

- a. Anyone feel that this case just isn't right for you because of some relevant experience or because of an opinion or belief that you hold?